

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

	-----X
ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE and ASTRAZENECA LP, KBI INC. and KBI-E INC.,	:
	07-CV-6790 (CM)(FM)
	:
Plaintiffs and Counterclaim-Defendants,	:
	:
v.	:
	:
DR. REDDY'S LABORATORIES, LTD. and DR. REDDY'S LABORATORIES, INC.	:
	:
Defendants and Counterclaim-Plaintiffs.	:
	:

-----X

**ASTRAZENECA'S MOTION TO FILE UNDER SEAL
EXPLANATION OF INFRINGEMENT DISCOVERY
AND ATTACHED EXHIBITS**

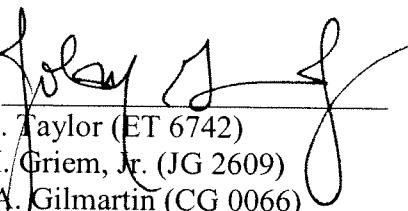
Plaintiff AstraZeneca AB, Aktiebolaget Hässle, AstraZeneca LP, KBI Inc. and KBI-E Inc. (collectively “AstraZeneca”) respectfully moves this Court for an order sealing its *Plaintiff AstraZeneca's Explanation Of Infringement Discovery* and attached exhibits, including *Plaintiff AstraZeneca's First Set Of Requests For Production Of Documents And Things On The Merits* (Nos. 1-6), *Plaintiff AstraZeneca's Second Set Of Interrogatories To Defendants Dr. Reddy's Laboratories, Ltd. And Dr. Reddy's Laboratories, Inc.* (Nos. 11-12), and *Plaintiff AstraZeneca's Notice Of Deposition Of Defendants Dr. Reddy's Laboratories, Ltd. And Dr. Reddy's Laboratories, Inc. Pursuant To Fed. R. Civ. P. 30(b)(6)*.

In support of this motion, AstraZeneca states that the Explanation and attached exhibits contain information Defendants assert is confidential.

Accordingly, AstraZeneca respectfully requests that the Court order that AstraZeneca's Explanation and attached exhibits be filed under seal and that they only be accessible by the Court and the parties.

A proposed order is submitted herewith.

Date: November 19, 2007

By: 
Errol B. Taylor (ET 6742)
John M. Griem, Jr. (JG 2609)
Claire A. Gilmartin (CG 0066)
MILBANK, TWEED, HADLEY &
McCLOY LLP
1 Chase Manhattan Plaza
New York, New York 10005-1413
(212) 530-5000

Attorneys for Plaintiffs
ASTRAZENECA AB,
AKTIEBOLAGET HÄSSLE,
ASTRAZENECA LP, KBI INC.
AND KBI-E INC.

CERTIFICATE OF SERVICE

I certify that on this 19th day of November 2007, I caused a true and correct copy of the foregoing **ASTRAZENECA'S MOTION TO FILE UNDER SEAL EXPLANATION OF INFRINGEMENT DISCOVERY AND ATTACHED EXHIBITS** be served upon counsel for DRL in the following manner:

BY FEDERAL EXPRESS & FACSIMILE

Louis H. Weinstein, Esq.
Michael Imbacuan, Esq.
BUDD LARNER
150 John F. Kennedy Parkway
Short Hills, NJ 07078-2703
Facsimile: (973) 379-7734
